

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA, )  
Plaintiff, )  
-vs- )  
)  
(1) LINDSEY K. SPRINGER, Individually )  
and as Co-Trustee of the S.L.C.A. Family ) Case No. 08-CV-278-TCK-PJC  
Trust; (2) REGINA M. CARLSON, as )  
Co-Trustee of the S.L.C.A. Family Trust; )  
(3) MARTHA F. MOORE, Individually and )  
as Trustee of the W. T. Moore and Martha F. )  
Moore Revocable Trust dated June 12, 2002; )  
(4) W. T. SMITH; and (5) JANNETH S. SMITH, )  
)  
Defendants. )

**REPLY TO RESPONSE OF LINDSEY K. SPRINGER OBJECTION  
CONCERNING MORTGAGEES' MOTION TO CLARIFY**

The parties Martha F. Moore, individually and as Trustee of the W. T. Moore and Martha F. Moore Revocable Trust dated June 12, 2002, and W. T. Smith and Janneth S. Smith, (collectively the "mortgagees"), reply to the response of Lindsey K. Springer concerning clarification of the property interest and description sold being limited to the "surface and the surface rights only". (Doc. 199, Springer "Objection").

The Opinion and Order entered by this Court found that Lindsey K. Springer is the true beneficial owner of the real property. (Doc. 179, page 29). The S.L.C.A. Family Trust no longer has any interests to be considered by this Court in this case.

Springer argues that "the question of minerals needs to be determined". (Doc. 199, page 2). There is no question to be answered. The mortgagees obtained ownership

of minerals by separate mineral deed. No mineral interest was conveyed to Mr. and Mrs. Greenhaw. The Greenhaws could not and did not convey any mineral interest to Springer or his nominee, S.L.C.A. Family Trust.

The issues which Springer seeks to raise have no relevance or import, including claim of "a different legal description" related to the mineral deed, and "no changes" in the mortgage assumption agreement which allowed conveyance by the Greenhaws. The determination and order of this Court that tax lien(s) against the property be foreclosed and the property sold, ended all concerns about the conveyance to S.L.C.A. Family Trust, the nominee of Lindsey K. Springer. Springer neither presents nor raises any legal or factual grounds for this Court to reconsider or revisit the interest ordered sold.

The mortgagees request that the deed to the successful purchaser reflect that only the surface and surface rights are conveyed.

Dated this September 25, 2010.



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Attorney for the W. T. Moore and  
Martha F. Moore Revocable Trust dated  
June 12, 2002 and  
W. T. Smith and Janneth S. Smith  
Cross Claimants (Mortgagees)

**Certificate of Service**

I certify that on September 25, 2010, a true and correct copy of the foregoing

**REPLY TO RESPONSE OF LINDSEY K. SPRINGER OBJECTION  
CONCERNING MORTGAGEES' MOTION TO CLARIFY**

was electronically filed with the Clerk of the Court using the CM/ECF system, and I forwarded a true and correct copy by electronic mail to Robert D. Metcalfe at [Robert.D.Metcalfe@usdoj.gov](mailto:Robert.D.Metcalfe@usdoj.gov) and to [James.C.Strong@usdoj.gov](mailto:James.C.Strong@usdoj.gov), who have arranged for such service. Attorney does not at this time have an electronic mail address for Lindsey K. Springer.

A true and correct copy of the foregoing described document was mailed by U.S. Mails, with postage fully prepaid thereon, to the following:

Lindsey K. Springer, individually and as Co-Trustee of the S.L.C.A. Family Trust # 02580-063

FCI - Big Springs  
1900 Simler Avenue  
Big Springs, TX 79720  
and to

Regina M. Carlson, individually and as Co-Trustee of the S.L.C.A. Family Trust  
1003 Westland Road  
Sapulpa, OK 74066

  
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PO Box 190  
Sapulpa, OK 74067